

FILED

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF NEW YORK

May 20 - 2025

John M. Domurad, Clerk

**Stanley Zhong, et al. (Pro Se),**

Plaintiffs,

v.

**The Trustees of Cornell University,  
et al.**

Defendants.

Case No. 3:25-cv-00365

Assigned to: The Honorable Miroslav Lovric

**MOTION FOR LEAVE TO APPEAR VIRTUALLY AT INITIAL CONFERENCE**

Plaintiffs, Stanley Zhong and Nan Zhong, proceeding pro se, respectfully move this Honorable Court for leave for both Plaintiffs to appear virtually via Zoom, telephone, or other method specified by the Court at the Initial Conference currently scheduled in this matter, or in the alternative, for one Plaintiff to appear virtually while the other appears in person, should the Court require an in-person presence.

In support of this motion, Plaintiffs state as follows:

1. By TEXT NOTICE dated March 25, 2025, (Docket Entry No. 4), the Court stated:

"TEXT NOTICE: The Initial Conference on 6/25/2025 at 2:30 PM before Magistrate Judge Miroslav Lovric will be held in Person, at 15 Henry Street, 1st Floor Courtroom, Binghamton, NY."

2. Plaintiffs Stanley Zhong and Nan Zhong, who are proceeding pro se in this matter, both reside in Mountain View, California.
3. Mountain View, California, is located approximately 2,800 miles from Binghamton, New York, where the Initial Conference has been set for an in-person appearance.
4. Requiring in-person attendance for both Plaintiffs would necessitate substantial cross-country travel time (likely multiple days including travel for each Plaintiff) and significant expense (including airfare, ground transportation, and accommodation for two individuals).
5. Plaintiffs believe that virtual appearance for both will allow for their full and effective participation in the Initial Conference without imposing undue hardship or expense. Plaintiffs have the necessary technological capabilities to participate effectively via video or teleconference.
6. Plaintiffs understand and respect the Court's preferences regarding in-person appearances, as stated in the TEXT NOTICE. However, given the extreme distance and associated burdens in this instance, Plaintiffs respectfully submit that virtual attendance for both Plaintiffs would be appropriate, efficient, and would not prejudice any party for this initial procedural conference. In the alternative, should the Court require an in-person presence from Plaintiffs, Plaintiffs respectfully request that the Court consider allowing one Plaintiff to appear in person while the other Plaintiff is granted leave to appear virtually, which would significantly mitigate the travel and financial burdens while still ensuring a physical presence on behalf of Plaintiffs. Should the Court

nonetheless deem an in-person appearance absolutely essential for both Plaintiffs, Plaintiffs will, of course, make arrangements to comply.

7. As of the date of this filing, counsel for Defendants has not yet formally appeared on the docket in this action. Plaintiffs will endeavor to confer with opposing counsel regarding this request if an appearance is made prior to the conference and will promptly inform the Court of Defendants' position.

**WHEREFORE**, Plaintiffs respectfully request that this Court grant leave for both Plaintiffs, Stanley Zhong and Nan Zhong, to appear virtually at the Initial Conference; or, in the alternative, for one Plaintiff to appear in person and the other Plaintiff to appear virtually.

Dated: May 20, 2025

Respectfully Submitted,

/s/ Stanley Zhong

Stanley Zhong

(same address as Nan Zhong)

/s/ Nan Zhong

Nan Zhong

Plaintiff, Pro Se

211 Hope St #390755

Mountain View, CA 94039

425-698-9139

nanzhong1@gmail.com